



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 15, 2016

Via ECF and Email

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
Email: CrottyNYSDChambers@nysd.uscourts.gov

**Re: United States v. Efrain Antonio Campo Flores, et ano.,
S2 15 Cr. 765 (PAC)**

Dear Judge Crotty:

The Government writes to inform the Court of additional facts disclosed by Confidential Source-2 ("CS-2") following his testimony during the hearing on September 9, 2016. Specifically, the Government interviewed CS-2 on September 13 and 14, 2016 regarding the individual ("Male-1") who traveled to Caracas, Venezuela with Confidential Source-1 ("CS-1") and CS-2 in October 2015. (*See* Tr. 361-62, 366-67, 390-92). During those post-hearing interviews, CS-2 disclosed, among other things, the following:

- Approximately two or three days before CS-1 and CS-2 flew from Mexico to Caracas at the direction of the Drug Enforcement Administration ("DEA"), CS-2 invited Male-1 to travel with them and agreed to pay for Male-1's expenses during the trip. CS-2 extended the invitation without the authorization of the DEA, and, at least in part, with the expectation that the appearance of an additional person traveling with CS-1 and CS-2 would enhance the defendants' perception of CS-1 and CS-2 as legitimate, capable drug traffickers.
- CS-1, CS-2, and Male-1 flew from Mexico to Caracas together. CS-2 paid for the flights using funds from a payment that he had recently received from the DEA related to another investigation.

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- Male-1 accompanied CS-1 and CS-2 to each of the three meetings with the defendants at which the pending cocaine transaction was discussed. CS-2 introduced Male-1 as a friend, but understood that the introduction suggested to the defendants that Male-1 was a drug-trafficking associate of CS-1 and CS-2. Male-1 sat in the back of the room during each of the three meetings.
- In Caracas, CS-2 told Male-1 that he would pay Male-1 between approximately \$50,000 and \$100,000 if the cocaine transaction involving the defendants was carried out successfully.

Notes from the Government's interviews of CS-2 on September 13 and 14, 2016 will be provided today to counsel for the defendants.

Respectfully submitted,

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